ATTACHMENT B3		
Section	**Change**	**Explanation of Change**
Attachment B3	Changed "drum" to "container."	Editorial to account for all container types allowed at WIPP.
Attachment B3	Provided corrected references throughout due to formatting changes.	Corrected formatting.
Table of Contents for Attachment B3	Modified title, section numbers, section titles, and table numbers	Corrected formatting to reflect modifications made in the PMR.
List of Tables	~~B3-11 Testing Batch Data Report Contents~~	Table B3-11 was deleted because Batch Data Reports will be generated from sample collection and analytical data and will not include testing data. The term "testing" is relevant to radiography and VE which were removed from the generator/storage site's waste analysis requirements. The justification for this change is provided in Sections 1.2.1 and 1.2.2 of the revised PMR and Appendix I of the Section 311 NOD Comment/Response Matrix.
B3-1	The Permittees shall require the generator/storage sites (**sites**) to perform validation of all sampling and analytical data ~~(qualitative as well as quantitative)~~ generated in accordance with the requirements of the Waste Analysis Plan (**WAP**) so that data used for Waste Isolation Pilot Plant (**WIPP**) compliance programs will be of known and acceptable quality. . . Entry B3-1 add this to the end of the quoted permit text and put in yellow highlight ". . .these quantitative determinations will be compated to the Quality Assurance Objectives (**QAOs**) specified in Sections B3-2 through B3-~~9~~8."	To clarify that the term "data" indicated here pertains to data from SSA and HSGSA generated in accordance with the requirements in the WAP. The deleted phrase was redundant with the term "all sampling and analytical data."

Section	Change	Explanation of Change
B3-1	~~The qualitative data or descriptive information generated by radiography and visual examination is not amenable to statistical data quality analysis. However, radiography and visual examination are complementary techniques yielding similar data for determining the waste matrix code and waste material parameter weights of waste present in a waste container. Therefore, visual examination results shall be used to verify the waste matrix code and waste material parameter weights determined by radiography. The waste matrix code is determined and waste material parameter weights are estimated to verify that the container is properly included in the appropriate waste stream.~~	Removed information specific to radiography and VE methods for waste analysis. The generator/storage sites are no longer required to examine all containers through radiography or VE to identify physical form and verify the absence of prohibited items, unless AK does not clearly substantiate the physical form of the waste and the absence of prohibited items. The justification for this change is provided in Sections 1.2.1 and 1.2.2 of the revised PMR and Appendix I of the Section 311 NOD Comment/Response Matrix.
B3-1	Comparability is the degree to which one data set can be compared to another. Comparability of data generated at different sites will be assured through the use of standardized, ~~approved testing~~, sampling, preservation, and analytical techniques and by meeting the QAOs specified in Sections B3-2 through B3-~~9~~8**.**	The term "testing" is relevant to radiography and VE which were removed from the generator/storage site's waste analysis requirements. The justification for this change is provided in Section 1.2.2 of the revised PMR and Appendix I of the Section 311 NOD Comment/Response Matrix.
B3-1	The Permittees shall ensure that data usability criteria are consistently established and used by the generator/storage sites to assess the usability of analytical ~~and testing~~ data. The criteria shall address. as appropriate, the following:	The term "testing" is relevant to radiography and VE which were removed from the generator/storage site's waste analysis requirements. The justification for this change is provided in Section 1.2.2 of the revised PMR and Appendix I of the Section 311 NOD Comment/Response Matrix.

Section	Change	Explanation of Change
B3-1	Representativeness of waste containers from waste streams subjected to ~~visual examination and~~ headspace gas, homogeneous solids, and soil/gravel sampling and analysis will be validated, through documentation, that a true random sample with an adequate population was identified and collected consistent with Permit Attachment B2, Section B2-1.	Removed information specific to radiography and VE methods for waste analysis. The generator/storage sites are no longer required to examine all containers through radiography or VE to identify physical form and verify the absence of prohibited items, unless AK does not clearly substantiate the physical form of the waste and the absence of prohibited items. The justification for this change is provided in Sections 1.2.1 and 1.2.2 of the revised PMR and Appendix I of the Section 311 NOD Comment/Response Matrix. Editorial changes to include HSGSA to the list of sampling and analysis to be validated for representativeness and to clarify that the statistical methods used in sampling and analysis are included in Permit Attachment B2.
B3-1	~~Nonconformance to Data Quality Objectives (DQOs)~~ ~~For any non-administrative nonconformance related to applicable requirements specified in this Waste Analysis Plan (WAP) which are first identified at the site Project Manager signature release level (i.e., a failure to meet a data quality objective [DQO]), the Permittees shall receive written notification within five (5) calendar days of identification and shall also receive a nonconformance report within thirty (30) calendar days of identification of the incident. The Permittees shall require the generator/storage site to implement a corrective action which remedies the nonconformance prior to management, storage, or disposal of the waste at WIPP. The Permittees shall send NMED a monthly summary of nonconformances identified during the previous month, indicating the number of nonconformances received and the generator/storage sites responsible.~~	Editorial change since the paragraph was moved to Section B3-12, Nonconformances.
B3-1	If a target analyte list for a waste stream is expanded due to the presence of TICs, all subsequent samples collected from that waste stream will be analyzed for constituents on the expanded list.	Editorial to clarify that the expanded target analyte list is applicable to all subsequent samples collected only from the waste stream of concern.

Section	Change	Explanation of Change
B3-2	~~With the exception of qualifying LANL sealed sources waste containers, headspace-gas sampling will occur from the headspace within each drum of transuranic (TRU) mixed waste or randomly selected containers from waste streams that meet the conditions for reduced headspace gas sampling listed in Attachment B, Section B-3a(1). The LANL sealed sources waste containers that meet specified conditions must be assigned VOC concentration values in accordance with Section B-3a(1)(iii).~~	Removed language specific to LANL sealed sources and waste streams that meet conditions for reduced headspace gas sampling. In the revised PMR, HSGSA is required to resolve assignment of EPA hazardous waste numbers for all debris waste streams when AK is determined insufficient. The justification of this change is provided in Section 1.2.1 of the revised PMR and Appendix I of the Section 311 NOD Comment/Response Matrix.
B3-2	Sampling completeness shall be expressed as the number of valid samples collected as a percent of the total number of samples collected for each waste stream. ~~The completeness can also be expressed as the number of valid samples collected as a percent of the total number of drums for each waste stream.~~	Modified to reflect definition of completeness based on representative sampling scenario. The justification of this change is provided in Section 1.2.1 of the revised PMR and Appendix I of the Section 311 NOD Comment/Response Matrix.
B3-2	Specific headspace-gas sampling steps to ensure samples are representative include: • Selection of the correct Drum Age Criteria **(DAC)** Scenario and waste packaging configuration and meeting DAC equilibrium times.	Editorial to clarify abbreviation of DAC.
B3-4	~~B3-4 Radiography~~	Removed specific requirements related to examination of waste containers through the use of radiography, such as QAOs for radiography, from the generator/storage site' waste analysis. These requirements are now reserved for waste examination by the Permittees. Thus, information in Section B3-4, with minor modifications, has been moved to Section B7-1b(7)(i). The justification for this change is provided in Section 1.2.2 of the revised PMR. Sections have been renumbered .

Section	Change	Explanation of Change
B3-4	~~Quality Assurance Objectives~~ ~~The QAOs for radiography are detailed in this section. If the QAOs described below are not met, then corrective action shall be taken. It should be noted that radiography does not have a specific MDL because it is primarily a qualitative determination. The objective of radiography for the program is to verify the waste matrix code and identify prohibited items for each waste container and to estimate each waste material parameter weight (Table B3-1). The Permittees shall require each site to describe all activities required to achieve these objectives in the site quality assurance project plan (QAPjP) and standard operating procedures (SOP).~~	Removed specific requirements related to examination of waste containers through the use of radiography, such as QAOs for radiography, from the generator/storage site' waste analysis. These requirements are now reserved for waste examination by the Permittees. Thus, information in Section B3-4, with minor modifications, has been moved to Section B7-1b(7)(i). The justification for this change is provided in Section 1.2.2 of the revised PMR.
B3-4	~~Data to meet these objectives must be obtained from an audio/videotaped (or equivalent media) scan provided by trained radiography operators at the sites. Results must also be recorded on a radiography data form. The precision, accuracy, completeness, and comparability objectives for radiography data are presented below.~~ ~~Precision~~	Removed specific requirements related to examination of waste containers through the use of radiography, such as QAOs for radiography, from the generator/storage site' waste analysis. These requirements are now reserved for waste examination by the Permittees. Thus, information in Section B3-4, with minor modifications, has been moved to Section B7-1b(7)(i). The justification for this change is provided in Section 1.2.2 of the revised PMR.
B3-4	~~The qualitative determinations, such as verifying the waste matrix code, made during radiography do not lend themselves to statistical evaluation of precision because of the qualitative nature of the inspection. However, comparison of data derived from radiography and visual examination on the same waste containers at the Rocky Flats Environmental Technology Site and the Idaho National Engineering Laboratory indicates that radiography operators can provide estimated inventories and weights of waste items in a waste container. As a measure of precision, the Permittees shall require each Site Project QA Officer to calculate and report the RPD between the estimated waste material parameter weights as determined by radiography and these same parameters as determined by visual examination. Additionally, the precision of radiography is verified prior to use by tuning precisely enough to demonstrate compliance with QAOs through viewing an image test pattern.~~	Removed specific requirements related to examination of waste containers through the use of radiography, such as QAOs for radiography, from the generator/storage site' waste analysis. These requirements are now reserved for waste examination by the Permittees. Thus, information in Section B3-4, with minor modifications, has been moved to Section B7-1b(7)(i). The justification for this change is provided in Section 1.2.2 of the revised PMR.

Section	Change	Explanation of Change
B3-4	~~Accuracy~~ ~~The programmatic accuracy at which the waste matrix code and waste material parameter weights can be determined must be documented through visual examination of a randomly selected statistical portion of waste containers. The Permittees shall require the Site Project QA Officer to calculate and report the miscertification rate of waste containers that require assignment to a different waste matrix code or are found to contain prohibited items after visual examination as a measure of radiography accuracy. The miscertification rate shall be used to determine the number of drums subject to confirmatory visual examination.~~	Removed specific requirements related to examination of waste containers through the use of radiography, such as QAOs for radiography, from the generator/storage site' waste analysis. These requirements are now reserved for waste examination by the Permittees. Thus, information in Section B3-4, with minor modifications, has been moved to Section B7-1b(7)(i). The justification for this change is provided in Section 1.2.2 of the revised PMR.
B3-4	~~Completeness~~ ~~An audio/videotape (or equivalent media) of the radiography examination and a validated radiography data form will be obtained for 100 percent of the retrievably stored waste containers in the program for all waste containers subject to radiography. All audio/videotapes (or equivalent media) and radiography data forms will be subject to validation as indicated in Section B3-10.~~	Removed specific requirements related to examination of waste containers through the use of radiography, such as QAOs for radiography, from the generator/storage site' waste analysis. These requirements are now reserved for waste examination by the Permittees. Thus, information in Section B3-4, with minor modifications, has been moved to Section B7-1b(7)(i). The justification for this change is provided in Section 1.2.2 of the revised PMR.
B3-4	~~Comparability~~ ~~The comparability of radiography data from different sites shall be enhanced by using standardized radiography procedures and operator qualifications.~~	Removed specific requirements related to examination of waste containers through the use of radiography, such as QAOs for radiography, from the generator/storage site' waste analysis. These requirements are now reserved for waste examination by the Permittees. Thus, information in Section B3-4, with minor modifications, has been moved to Section B7-1b(7)(i). The justification for this change is provided in Section 1.2.2 of the revised PMR~~.~~
Section Renumbering after Section B3-4	All subsequent sections have been renumbered.	Required due to the deletion of section B3-4

Section	Change	Explanation of Change
B3-8	Appropriate analytical ~~and testing~~ results ~~will~~ may be used to ~~confirm~~ supplement the ~~characterization~~ analysis of wastes based on acceptable knowledge (Section B4-~~4~~2c of Attachment B4). To ensure that the acceptable knowledge process is consistently applied, the Permittees shall require sites to comply with the following data quality requirements for acceptable knowledge documentation:	The term "testing" is relevant to radiography and VE which were removed from the generator/storage site's waste analysis requirements. The justification for this change is provided in Section 1.2.2 of the revised PMR and Appendix I of the Section 311 NOD Comment/Response Matrix. Modified language to clarify that the generator/storage sites will continue to use HSGSA and SSA to supplement the analysis of wastes based on AK, unless NMED determines that AK is sufficient. The justification for this change is provided in Section 1.2.1 of the revised PMR and Appendix I of the Section 311 NOD Comment/Response Matrix.
B3-8	The percentage of waste containers which require reassignment to a new waste matrix code and/or designation of different hazardous waste ~~codes~~ numbers based on ~~an the reevaluation of acceptable knowledge and~~ sampling and analysis data and waste analysis discrepancies identified by the Permittees during waste examination will be reported as a measure of acceptable knowledge accuracy.	Modified to include waste analysis discrepancies identified by the Permittees during waste examination, in addition sampling and analysis data, to be reported against AK accuracy if any of them require reassignment to a new waste matrix code and/or designation of different hazardous waste. The justification for this change is provided in Sections 1.2.1 and 1.2.2.
B3-8	~~The Permittees shall require each generator/storage site to comply with the nonconformance notification and reporting requirements of Section B3-1 if the results of confirmatory analytical techniques specified in Permit Attachment B are inconsistent with acceptable knowledge documentation.~~	Removed requirements related to AK confirmation by the generator/storage site. The justification for this change is provided in Section 1.2.1 of the revised PMR and Appendix I of the Section 311 NOD Comment/Response Matrix.

Section	Change	Explanation of Change
B3-8	The Permittees shall require each site to address quality control by tracking its performance with regard to the use of acceptable knowledge by~~: 1)~~ assessing the frequency of inconsistencies among information~~, and 2) documenting the results of acceptable knowledge confirmation through radiography, visual examination, headspace-gas analyses, and solidified waste analyses~~. In addition, the acceptable knowledge process and waste stream documentation must be evaluated through internal assessments by generator/storage site quality assurance organizations and assessments by auditors external to the organization (i.e., the Permittees).	Removed requirement for the generator/storage sites to confirm AK through radiography, VE, headspace gas analyses, and solidified waste analyses. The justification for this change is provided in Section 1.2.1 of the revised PMR and Appendix I of the Section 311 NOD Comment/Response Matrix. Editorial to identify individuals/organizations responsible to evaluate the AK process and waste stream documentation.
B3-9	~~A Testing Batch Data Report or equivalent includes all data pertaining to radiography or visual examination for up to 20 waste containers without regard to waste matrix. Table B3-11 lists all of the information required in Testing Batch Data Reports (identified with an "X") and other information that is necessary for data validation, but is optional in Testing Batch Data Reports (identified with an "O").~~	Text was deleted because Batch Data Reports will be generated from sample collection and analytical data and will not include testing data. The term "testing" is relevant to radiography and VE which were removed from the generator/storage site's waste analysis requirements. The justification for this change is provided in Sections 1.2.1 and 1.2.2 of the revised PMR and Appendix I of the Section 311 NOD Comment/Response Matrix.
B3-9a	All electronic ~~and video~~ data must be stored appropriately to ensure that waste container, sample, and associated QC data are readily retrievable.	The term "video" was deleted because it is relevant to data from radiography which was removed the generator/storage site's waste analysis requirements. The justification for this change is provided in Section 1.2.2 of the revised PMR and Appendix I of the Section 311 NOD Comment/Response Matrix.
B3-9a	Data review, validation, and verification at this level involves scrutiny and signature releases from qualified independent technical reviewers(s)[1], ~~technical supervisor(s), and a QA representative,~~ as specified below.	The revised PMR eliminates overlapping and redundant review procedures. The data generation level of review is reduced to the Independent Technical Review, thus eliminating the Technical Supervisory Review and Facility Quality Assurance Review. The justification for this change is provided in Section 1.2.4 of the revised PMR.

Section	Change	Explanation of Change
B3-9a(1)	However at a minimum, the independent technical review must be performed before any waste associated with the data reviewed is managed, stored, or disposed at WIPP, unless the data are being obtained from waste sampling and analysis as containers are being retrieved or generated after initial WSPF approval as described in Attachment B2, Section B2-1.	Added language to clarify that an initial WSPF approval of a waste stream may not include data from waste sampling and analysis from the entire waste stream. The data would become available as containers are being retrieved or generated. The justification for this change is provided in Section 1.2.1.2 of the revised PMR and Appendix I of the Section 311 NOD Comment/Response Matrix.
B3-9a(1)	The ~~testing,~~ sampling~~,~~ or analytical data QA documentation for Batch Data Reports is complete and includes, as applicable, raw data, DAC and equilibrium calculations and times, calculation records, chain-of-custody (**COC**) forms, calibration records (or references to an available calibration package), QC sample results, and copies or originals of gas canister sample tags.	The term "testing" is relevant to radiography and VE which were removed from the generator/storage site's waste analysis requirements. Batch Data Reports will be generated from sample collection and analytical data and will not include testing data. The justification for this change is provided in Sections 1.2.1 and 1.2.2 of the revised PMR and Appendix I of the Section 311 NOD Comment/Response Matrix.
B3-9a(1)	Data outside of established control limits will be qualified as appropriate, assigned an appropriate qualifier flag, discussed in the case narrative, and included as appropriate in calculations for completeness. QC criteria that were not met are documented.	Editorial to clarify that QC criteria that were not met must be documented by the reviewer(s).
B3-9a(1)	~~Radiography tapes have been reviewed (independent observation) on a waste container basis at a minimum of once per testing batch or once per day of operation, whichever is less frequent (Attachment B1, Section B1-3b(2)). The radiography tape will be reviewed against the data reported on the radiography form to ensure that the data are correct and complete.~~	Removed information specific to radiography and VE methods for waste analysis. The generator/storage sites are no longer required to examine all containers through radiography or VE to identify physical form and verify the absence of prohibited items, unless AK does not clearly substantiate the physical form of the waste and the absence of prohibited items. The justification for this change is provided in Sections 1.2.1 and 1.2.2 of the revised PMR and Appendix I of the Section 311 NOD Comment/Response Matrix.

Section	Change	Explanation of Change
B3-9a(1)	QAOs have been met according to the methods outlined in Section B3-2 through B3-8.	This was originally reviewed by the Facility Quality Assurance officer. The Independent Technical reviewer(s) is now responsible to ensure that QAOs have been met since the data generation level of review is reduced to the Independent Technical Review, thus eliminating the Technical Supervisory Review and Facility Quality Assurance Review. The justification to this change is provided in Section 1.2.4 of the revised PMR.
B3-10a(2)	~~B3-10a(2)~~ ~~Technical Supervisor Review~~	The revised PMR eliminates overlapping and redundant review procedures. The data generation level of review is reduced to the Independent Technical Review, thus eliminating the Technical Supervisory Review and Facility Quality Assurance Review. The justification for this change is provided in Section 1.2.4 of the revised PMR.
B3-10a(2)	~~The technical supervisor review ensures that the independent technical review was performed completely, that the Batch Data Report is complete, and verifies that the results are technically reasonable. This review validates and verifies that the characterization performed in this area is ready for QA office review.~~	The revised PMR eliminates overlapping and redundant review procedures. The data generation level of review is reduced to the Independent Technical Review, thus eliminating the Technical Supervisory Review and Facility Quality Assurance Review. The justification for this change is provided in Section 1.2.4 of the revised PMR.
B3-10a(2)	~~One hundred percent of the batch data reports must receive technical supervisory signature release for each testing batch, sampling batch, analytical batch and on-line batch. The technical supervisory signature release must occur as soon as practicably possible after the independent technical review in order to determine and correct negative quality trends in the sampling or analytical process. However at a minimum, the technical supervisory signature release must be performed before any waste associated with the data reviewed is managed, stored, or disposed at WIPP. This release must ensure the following:~~	The revised PMR eliminates overlapping and redundant review procedures. The data generation level of review is reduced to the Independent Technical Review, thus eliminating the Technical Supervisory Review and Facility Quality Assurance Review. The justification for this change is provided in Section 1.2.4 of the revised PMR.

Section	Change	Explanation of Change
B3-10a(2)	~~• The data are technically reasonable based on the technique used.~~ ~~• All data have received independent technical review with the exception of radiography tapes, which shall receive periodic technical review as specified in Attachment B1, Section B1-3b(2).~~ ~~• The testing, sampling, or analytical data QA documentation for Batch Data Reports is complete and includes, as applicable, raw data, DAC and equilibrium calculations and times, calculation records, COC forms, calibration records, QC sample results, and original or copies of gas sample canister tags.~~ ~~• Sample holding time requirements were met, or exceptions documented.~~ ~~• Field sampling records are complete.~~	The revised PMR eliminates overlapping and redundant review procedures. The data generation level of review is reduced to the Independent Technical Review, thus eliminating the Technical Supervisory Review and Facility Quality Assurance Review. The justification for this change is provided in Section 1.2.4 of the revised PMR.
B3-9b	Data validation and verification at this level involves scrutiny and signature release from the Site Project Manager (or designee) ~~and the Site Project QA Officer (or designee)~~.	The revised PMR eliminates overlapping and redundant review procedures. The project level of review is reduced to the Site Project Manager Review, thus eliminating the Site Project Quality Assurance Officer Review. The justification to this change is provided in Section 1.2.4 of the revised PMR.
B3-10b(1)	~~B3-10b(1) Site Project QA Officer~~	The revised PMR eliminates overlapping and redundant review procedures. The project level of review is reduced to the Site Project Manager Review, thus eliminating the Site Project Quality Assurance Officer Review. The justification to this change is provided in Section 1.2.4 of the revised PMR.

Section	Change	Explanation of Change
B3-10b(1)	~~The Site Project QA Officer review ensures that the Batch Data Reports received from the data generation level is complete, validates and verifies that the QC checks were done properly and meet program criteria, and ensures that the QAOs have been met.~~ ~~One hundred percent of the Batch Data Reports must receive Site Project QA Officer signature release. The Site Project QA Officer signature release must occur as soon as practicably possible in order to determine and correct negative quality trends in the sampling or analytical process. However at a minimum, the Site Project QA Officer signature release must be performed before any waste associated with the data reviewed is managed, stored, or disposed at WIPP~~. ~~This signature release must ensure the following:~~	The revised PMR eliminates overlapping and redundant review procedures. The project level of review is reduced to the Site Project Manager Review, thus eliminating the Site Project Quality Assurance Officer Review. The justification to this change is provided in Section 1.2.4 of the revised PMR.
B3-10b(1)	~~● Batch Data Reports are complete and data are properly reported (i.e., data are reported in correct units, with correct significant figures, and with correct qualifying flags).~~ ~~● Sampling batch QC checks (e.g., equipment blanks, field duplicates, field reference standards) were properly performed, and meet the established QAOs and are within established data useability criteria.~~ ~~● Testing batch QC checks (e.g., replicate scans, measurement system checks) were properly performed. Radiography data are complete and acceptable based on evidence of videotape review of one waste container per day or once per testing batch, whichever is less frequent, as specified in B1-3b(2).~~	The revised PMR eliminates overlapping and redundant review procedures. The project level of review is reduced to the Site Project Manager Review, thus eliminating the Site Project Quality Assurance Officer Review. The justification to this change is provided in Section 1.2.4 of the revised PMR.

Section	Change	Explanation of Change
B3-10b(1)	~~● Analytical batch QC checks (e.g., laboratory duplicates, laboratory blanks, matrix spikes, matrix spike duplicates, laboratory control samples) were properly performed and meet the established QAOs and are within established data useability criteria.~~ ~~● On-line batch QC checks (e.g., field blanks, on-line blanks, on-line duplicates, on-line control samples) were properly performed and meet the established QAOs and are within established data useability criteria.~~ ~~● Proper procedures were followed to ensure representative samples of headspace gas and homogeneous solids and soil/gravel were taken.~~ ~~● For LANL sealed sources waste streams, the quality control provisions for VOC source term development were properly implemented in accordance with Permit Attachment B, Section B-3a(1)(iii).~~	The revised PMR eliminates overlapping and redundant review procedures. The project level of review is reduced to the Site Project Manager Review, thus eliminating the Site Project Quality Assurance Officer Review. The justification to this change is provided in Section 1.2.4 of the revised PMR.
B3-9b(1)	The Site Project Manager Review is the final validation that all of the data contained in Batch Data Reports from the data generation level are complete and have been properly reviewed as evidenced by signature release and completed checklists.	The Site Project Quality Assurance Officer originally performed an initial review of the Batch Data Reports received from the data generation level which now becomes the responsibility of the Site Project Manager. The revised PMR eliminates overlapping and redundant review procedures. The project level of review is reduced to the Site Project Manager Review, thus eliminating the Site Project Quality Assurance Officer Review. The justification to this change is provided in Section 1.2.4 of the revised PMR.

Section	Change	Explanation of Change
B3-9b(1)	~~The Site Project Manager signature release must occur as soon as practicably possible after the Site Project QA officer signature release in order to determine and correct negative quality trends in the sampling or analytical process. However~~ A~~a~~t a minimum, the Site Project Manager signature release must be performed before any waste associated with the data reviewed is managed, stored, or disposed at WIPP, unless the data are being obtained from waste sampling and analysis as containers are being retrieved or generated as described in Permit Attachment B2, Section B2-1.	The Site Project QA Officer responsibility has been removed. Added language to clarify that an initial WSPF approval of a waste stream may not include data from waste sampling and analysis from the entire waste stream. The data would become available as containers are being retrieved or generated. The justification for this change is provided in Section 1.2.1.2 of the revised PMR and Appendix I of the Section 311 NOD Comment/Response Matrix.
B3-9b(1)	● ~~The Site Project Manager or designee shall determine~~ T~~t~~he validity of ~~the drum age criteria (~~DAC~~)~~ assignment made at the data generation level based upon an assessment of the data collection and evaluation necessary to make the assignment. ● ~~For LANL sealed sources waste streams, the VOC source term was properly developed and used in accordance with Permit Attachment B, Section B-3a(1)(iii).~~	Editorial. DAC has been previously ~~abbreviated~~ defined. Removed language specific to LANL sealed sources and waste streams that meet conditions for reduced headspace gas sampling. In the revised PMR, HSGSA is required to resolve assignment of EPA hazardous waste numbers for all debris waste streams when AK is determined insufficient. The justification of this change is provided in Section 1.2.1 of the revised PMR and Appendix I of the Section 311 NOD Comment/Response Matrix.
B3-9b(1)	• Sampling batch QC checks (e.g., equipment blanks, field duplicates, field reference standards) were properly performed, and meet the established QAOs and are within established data useability criteria.	These attributes are originally checked at the Site Project Quality Assurance Officer Review level and are now combined into the Site Project Manager Review level. The revised PMR eliminates overlapping and redundant review procedures. The project level of review is reduced to the Site Project Manager Review, thus eliminating the Site Project Quality Assurance Officer Review. The justification to this change is provided in Section 1.2.4 of the revised PMR.

Section	Change	Explanation of Change
B3-9b(1)	• Analytical batch QC checks (e.g., laboratory duplicates, laboratory blanks, matrix spikes, matrix spike duplicates, laboratory control samples) were properly performed and meet the established QAOs and are within established data useability criteria. • On-line batch QC checks (e.g., field blanks, on-line blanks, on-line duplicates, on-line control samples) were properly performed and meet the established QAOs and are within established data useability criteria. • Proper procedures were followed to assure representative samples of headspace gas and homogeneous solids and soil/gravel were taken.	These attributes are originally checked at the Site Project Quality Assurance Officer Review level and are now combined into the Site Project Manager Review level. The revised PMR eliminates overlapping and redundant review procedures. The project level of review is reduced to the Site Project Manager Review, thus eliminating the Site Project Quality Assurance Officer Review. The justification to this change is provided in Section 1.2.4 of the revised PMR.
B3-9b(1)	• Data generation level independent technical~~, technical supervisory, and QA officer (or designee)~~ review, validation, and verification have been performed as evidenced by the completed review checklists and appropriate signature releases.	The data generation level of review is reduced to the Independent Technical Review, thus eliminating the Technical Supervisory Review and Facility Quality Assurance Review. The justification for this change is provided in Section 1.2.4 of the revised PMR.
B3-9b(2)	To document the project-level validation and verification described above, the Permittees shall require each Site Project ~~QA Officer~~ Manager (or designee) to prepare a Site Project ~~QA Officer~~ Manager Summary and Data Validation Summary.	The project level of review is reduced to the Site Project Manager Review, thus eliminating the Site Project Quality Assurance Officer Review. The justification to this change is provided in Section 1.2.4 of the revised PMR.
B3-9b(2)	These reports may be combined to eliminate redundancy~~, and may be included with the Site Project QA Officer and Site Project Manager checklists~~. The Site Project ~~QA Officer~~ Manager Summary includes a validation checklist for each Batch Data Report. Checklists for the Site Project ~~QA Officer~~ Manager Summary must be sufficiently detailed to validate all aspects of a Batch Data Report that affect data quality. The Data Validation Summary provides ~~confirmation~~ verification that, on a per waste container or sample basis as evidenced by Batch Data Report reviews, all data have been validated in accordance with the site QAPjP.	The project level of review is reduced to the Site Project Manager Review, thus eliminating the Site Project Quality Assurance Officer Review. The justification to this change is provided in Section 1.2.4 of the revised PMR. Editorial to clarify that the Data Validation Summary provides verification per waste container or sample basis.

Section	Change	Explanation of Change
B3-9b(3)	In the event the Permittees request detailed information on a waste stream, the ~~s~~Site Project Manager will provide a Waste Stream ~~Characterization~~ Waste Analysis Package. The Site Project Manager ~~can require each characterization area, data generation level technical supervisor, and QA officer to assist in preparation and review of~~ must assure that the Waste Stream ~~Characterization~~ Waste Analysis Package (Section B3-1~~2~~1b(~~2~~3)) ~~as necessary to ensure the package~~ will support ~~the Site Project Manager's~~ waste ~~characterization~~ analysis determinations	Data generation level technical supervisor and QA officer were deleted from the paragraph since the level of review has been reduced to the Independent Technical Review, thus eliminating the Technical Supervisory Review and Facility Quality Assurance Review. The justification for this change is provided in Section 1.2.4 of the revised PMR. Changed "characterization" to "waste analysis" for consistency with NMAC language in 20.4.1.500 NMAC (incorporating 40 CFR §264.13). Corrected formatting.
B3-9c	The final level of data verification occurs at the Permittee level and must, at a minimum, consist of an inventory check of the Batch Data Reports to verify completeness. Permittee Level Verification is described in Attachment B7. ~~The Permittees are responsible for the verification that Batch Data Reports include the following:~~	To clarify that information related to data verification at the Permittee level has been moved to Permit Attachment B7, Section B7-1a(4). The justification to this change is provided in Section 1.2.2 of the revised PMR.
B3-9c	~~● Project-level signature releases~~ ~~● Listing of all waste containers being presented in the report~~ ~~● Listing of all testing, sampling, and analytical batch numbers associated with each waste container being reported in the package~~	Information related to data verification at the Permittee level has been moved to Permit Attachment B7, Section B7-1a(4). The justification to this change is provided in Section 1.2.2 of the revised PMR.

Section	Change	Explanation of Change
B3-9c	~~● Analytical Batch Data Report case narratives~~ ~~● Site Project QA Officer Summary~~ ~~● Data Validation Summary~~ ~~● Complete summarized qualitative and quantitative data for all waste containers with data flags and qualifiers.~~	Information related to data verification at the Permittee level has been moved to Permit Attachment B7, Section B7-1a(4). The justification to this change is provided in Section 1.2.2 of the revised PMR.
B3-9c	~~For each Waste Stream Profile Form (WSPF) submitted for approval, the Permittees must verify that each submittal (i.e., WSPF and Characterization Information Summary) is complete and notify the originating site in writing of the WSPF approval. The Permittees will maintain the data as appropriate for use in the regulatory compliance programs. At a minimum, the verification must:~~	Information related to data verification at the Permittee level has been moved to Permit Attachment B7, Section B7-1a(4). The justification to this change is provided in Section 1.2.2 of the revised PMR.
B3-9c	~~● Ensure the correct assignment of the waste stream description, Waste Matrix Code Group, Summary Category Groups, and EPA hazardous waste codes~~ ~~● Reconcile data~~ ~~● Contain summarized results of characterization~~ ~~● Contain acceptable knowledge summary documentation~~ ~~● List the methods used for characterization~~	Information related to data verification at the Permittee level has been moved to Permit Attachment B7, Section B7-1a(4). The justification to this change is provided in Section 1.2.2 of the revised PMR.
B3-9c	~~For subsequent shipments made after the initial WSPF approval, the verification will also include WWIS internal limit checks (Attachment B, Section B-4b(1)(i)).~~	Information related to data verification at the Permittee level has been moved to Permit Attachment B7, Section B7-1a(4). The justification to this change is provided in Section 1.2.2 of the revised PMR.

Section	Change	Explanation of Change
B3-10	Reconciling the results of waste ~~testing and~~ analysis with the DQOs provides a way to ensure that data will be of adequate quality to support the regulatory compliance programs. Reconciliation with the DQOs will take place at both the project level and the Permittees' level. At the project level, reconciliation will be performed by the Site Project Manager; while at the Permittees' level, reconciliation will be performed as described below.	Testing is removed because radiography methods were removed from modified PMR. Editorial
B3-10a	• Whether the waste stream contains listed waste found in 20.4.1.200 NMAC incorporating 40 CFR Part 261, Subpart D	Editorial to include listed waste as one of the WAP-required waste parameters to be reviewed by the Site Project Manager.
B3-10a	Deleted verbiage “Drum Age Criteria”, before it’s acronym.	Previously defined
B3-10a	• ~~Whether a sufficient number of waste containers have been visually examined (as a QC check on radiography) to determine with a reasonable level of certainty that the UCL_{90} for the miscertification rate is less than 14 percent~~	Removed text because VE as a QC check of generator/storage site radiography is no longer necessary. The justification for this change is provided in Section 1.2.2 of the revised PMR and Appendix I of the Section 311 NOD Comment/Response Matrix.
B3-10a	• Whether the overall completeness, comparability, and representativeness QAOs were met for each of the analytical ~~and testing~~ procedures as specified in Sections B3-2 through B3-~~9~~8 prior to submittal of a WSPF for a waste stream or waste stream lot.	The term “testing” is relevant to radiography and VE which were removed from the generator/storage site’s waste analysis requirements. The justification for this change is provided in Section 1.2.2 of the revised PMR and Appendix I of the Section 311 NOD Comment/Response Matrix. Corrected formatting.

Section	Change	Explanation of Change
B3-10a	If the Site Project Manager determines that insufficient data have been collected to make the determinations listed above, additional data collection efforts must be undertaken. The reconciliation of a waste stream shall be performed, as described in Permit Attachment B4, prior to submittal of WSPF and ~~Characterization~~ Waste Analysis Information Summary to the Permittees for that waste stream. ~~For subsequent shipments, data reconciliation is done on all containers or samples prior to shipment to WIPP.~~ The Permittees shall not ~~manage,~~ store~~,~~ or dispose TRU mixed waste at WIPP~~,~~ from any waste stream until ~~unless~~ the Site Project Manager determines that the WAP-required waste parameters listed above have been met for that waste stream.	Editorial to make consistent with the proposed Waste Stream Approval Process.
B3-10b	~~The~~ Permittees Level data reconciliation is discussed in Permit Attachment B7. ~~will ensure sufficient data have been collected in accordance with Attachment B, Section B-4a(1) to determine the following:~~	Information related to data reconciliation at the Permittee level has been moved to Permit Attachment B7, Section B7-1a(5). The justification to this change is provided in Section 1.2.2 of the revised PMR.
B3-10b	~~● The concentration of VOC constituents in the headspace in the total waste inventory has not exceeded the environment performance standards of 20.4.1.500 NMAC (incorporating 40 CFR §264.601(c)) as specified in Module IV;~~ ~~● Whether waste streams proposed for disposal in WIPP have been adequately characterized and~~ ~~● Whether data supports the information contained in the WIPP RCRA permit application~~	Information related to data reconciliation at the Permittee level has been moved to Permit Attachment B7, Section B7-1a(5). The justification to this change is provided in Section 1.2.2 of the revised PMR. Data reconciliation to ensure sufficiency of VOC analysis on waste containers for the environmental performance standards has been entirely deleted IAW changes brought about by Sections 311/310. The justification for this change is provided in Section 1.3 of the revised PMR.

Section	Change	Explanation of Change
B3-11a	The Batch Data Reports and checklists used must contain all of the information required by the ~~testing,~~ sampling~~,~~ and analytical techniques described in Permit Attachments B1 through B6 , as well as the signature releases to document the review, validation, and verification as described in Section B3-~~10~~9.	The term "testing" is relevant to radiography and VE which were removed from the generator/storage site's waste analysis requirements. Batch Data Reports will be generated from sample collection and analytical data and will not include testing data. The justification for this change is provided in Sections 1.2.1 and 1.2.2 of the revised PMR and Appendix I of the Section 311 NOD Comment/Response Matrix. Corrected formatting.
B3-11a	~~After review by t~~The Site Project Manager ~~QA Officer~~ will review all Batch Data Reports ~~will be forwarded to the Site Project Manager~~	The project level of review is reduced to the Site Project Manager Review, thus eliminating the Site Project Quality Assurance Officer Review. The justification to this change is provided in Section 1.2.4 of the revised PMR.
B3-11a	All Batch Data Reports shall be assigned serial numbers, and each page shall be numbered. The serial number used for Batch Data Reports can be the same as the ~~testing,~~ sampling~~,~~ or analytical batch number.	The term "testing" is relevant to radiography and VE which were removed from the generator/storage site's waste analysis requirements. Batch Data Reports will be generated from sample collection and analytical data and will not include testing data. The justification for this change is provided in Sections 1.2.1 and 1.2.2 of the revised PMR and Appendix I of the Section 311 NOD Comment/Response Matrix.

Section	Change	Explanation of Change
B3-11a	QA documentation, including raw data, shall be maintained in either ~~testing,~~ sampling~~,~~ and analytical facility files, or site project files for those facilities located on site in accordance with the document storage requirements of site approved site QAPjPs. Permittee approved laboratories ~~Contract waste characterization facilities~~ shall forward ~~testing,~~ sampling~~,~~ and analytical QA documentation along with Batch Data Reports to the site project office for inclusion in site project files.	The term "testing" is relevant to radiography and VE which were removed from the generator/storage site's waste analysis requirements. The justification for this change is provided in Section 1.2.2 of the revised PMR and Appendix I of the Section 311 NOD Comment/Response Matrix. To designate certain laboratories as "Permittee approved laboratories" which would be audited annually by the Permittees in accordance with Permit Attachment B6. The justification to this change is provided in Section 1.2.3 of the revised PMR.
B3-11b	The site project office shall prepare a WSPF for each waste stream certified for shipment to WIPP based on information obtained from acceptable knowledge and Batch Data Reports, if applicable. In addition, the site project office must ~~ensure~~ assure that the ~~Characterization~~ Waste Analysis Information Summary and the Waste Stream ~~Characterization~~ Waste Analysis Package (when requested by the Permittees) are prepared as appropriate. The Site Project ~~QA Officer~~ Manager must also verify these reports are consistent with information found in analytical batch reports. Summarized ~~testing, sampling~~~~,~~ and analytical data are included in the ~~Characterization~~ Waste Analysis Information Summary. The contents of the WSPF, ~~Characterization~~ Waste Analysis Information Summary, and Waste Stream ~~Characterization~~ Waste Analysis Package are discussed in the following sections.	Editorial to clarify that the WSPF is based on information obtained from AK and Batch Data Reports, if applicable. Modified ("characterization" to "waste analysis") for consistency with NMAC language in 20.4.1.500 NMAC (incorporating 40 CFR §264.13). The project level of review is reduced to the Site Project Manager Review, thus eliminating the Site Project Quality Assurance Officer Review. The justification to this change is provided in Section 1.2.4 of the revised PMR. The term "testing" is relevant to radiography and VE which were removed from the generator/storage site's waste analysis requirements. The justification for this change is provided in Section 1.2.2 of the revised PMR and Appendix I of the Section 311 NOD Comment/Response Matrix.

Section	Change	Explanation of Change
B3-11b(1)	• Whether waste is Contact-Handled or Remote-Handled	The revised PMR consolidates the Section 311 PMR and the RH PMR. The justification for this change is provided in Section 1.1 of the revised PMR.
B3-11b(1)	• Waste Material Parameter Weight Estimates per unit of waste	Editorial to include waste material parameter weight estimates to the WSPF.
B3-11b(2)	• ~~For LANL sealed sources waste streams, the VOC source term determination data (as defined by Attachment B, Section B-3a(1)(iii)) listing one-half the method detection limit and mean when used to assign concentrations for the headspace gas target analytes.~~ • ~~Total metal, VOC, and SVOC analytical results for homogeneous solids and soil/gravel (if applicable), and demonstration that control charting cannot be applied effectively, if this option is implemented.~~	Removed language specific to LANL sealed sources and waste streams that meet conditions for reduced headspace gas sampling. In the revised PMR, HSGSA is required to resolve assignment of EPA hazardous waste numbers for all debris waste streams when AK is determined insufficient. Control charting is no longer the method of choice in the revised PMR. The justification of this change is provided in Section 1.2.1 of the revised PMR and Appendix I of the Section 311 NOD Comment/Response Matrix.
B3-11b(2)	• TIC listing and evaluation~~, and verification that acceptable knowledge (AK) was confirmed~~. • ~~Radiography and visual examination summary to document that all prohibited items are absent in the waste and to confirm AK, and documentation and justification for the use of radiography in lieu of or in combination with visual examination/visual examination technique for newly generated waste.~~	Removed information specific to radiography and VE methods for waste analysis. The generator/storage sites are no longer required to examine all containers through radiography or VE to identify physical form and verify the absence of prohibited items, unless AK does not clearly substantiate the physical form of the waste and the absence of prohibited items. The generator/storage sites are no longer required to confirm AK. The justification for this change is provided in Sections 1.2.1 and 1.2.2 of the revised PMR and Appendix I of the Section 311 NOD Comment/Response Matrix.

Section	Change	Explanation of Change
B3-11b(2)	• Method for determining Waste Material Parameter Weights per unit of waste	Added to include method for determining waste material parameter weights in the Waste Analysis Information Summary. The justification for this change is provided in Appendix I of the Section 311 NOD Comment/Response Matrix.
B3-11b(3)	• ~~Complete AK summary (Section B3-12b~~	Editorial to remove redundancy. A complete AK summary has been included in the Waste Analysis Information Summary.
B3-11b(3)	• Batch Data Reports supporting the ~~confirmation of AK~~ analysis of the waste stream and any others requested by the Permittees	Removed information specific to the confirmation of AK since the generator/storage sites are no longer required to confirm AK. Batch Data Reports will be generated from sample collection and analytical data supplementing analysis of the waste stream. The justification for this change is provided in Sections 1.2.1 and 1.2.2 of the revised PMR and Appendix I of the Section 311 NOD Comment/Response Matrix.
B3-11b(4)	~~The Permittees will coordinate the data transmission with each generator/storage site. Actual data transmission will use appropriate technology to ensure the integrity of the data transmissions. The Permittees will require sites with large waste inventories and large databases to populate a data structure provided by the Permittees that contains the required data dictionary fields that are appropriate for the waste stream (or waste streams) at that site. For example, totals analysis data will not be requested from sites that do not have homogeneous solids or soil/gravel waste. The Permittees will access this data via the Internet to ensure an efficient transfer of this data. Small quantity sites will be given a similar data structure by the Permittees that is tailored to their types of waste. Sites with very small quantities of waste will be provided with the ability to assemble the data interactively to this data structure on the WWIS.~~	Text has been moved to Attachment B7
B3-12	The Permittees shall require the status of work and the WAP activities at participating generator/storage sites to be monitored and controlled by the Site Project Manager ~~and Site Project QA Officer~~.	The project level of review is reduced to the Site Project Manager Review, thus eliminating the Site Project Quality Assurance Officer Review. The justification to this change is provided in Section 1.2.4 of the revised PMR.

Section	Change	Explanation of Change
B3-12	~~The Permittees shall comply with the nonconformance requirements specified in Section B3-1 of this Permit Attachment.~~	Editorial since the text was deleted from Section B3-1.
B3-12	The Permittees shall require the Site Project ~~QA Officer~~ Manager to oversee the nonconformance report process and be responsible for developing a plan to identify and track all nonconformances and report this information to the Permittees. ~~Documentation of nonconformances shall be made available to t~~The Site Project Manager~~, who in turn~~ is also responsible for notifying project personnel of the nonconformance~~.~~ and verify Complection of the corrective action for nonconformances ~~must be verified by the Site Project QA Officer~~.	The project level of review is reduced to the Site Project Manager Review, thus eliminating the Site Project Quality Assurance Officer Review. The justification to this change is provided in Section 1.2.4 of the revised PMR.
B3-12	Nonconformance to Data Quality Objectives (**DQOs**) For any non-administrative nonconformance related to applicable requirements specified in this WAP which are first identified at the site Project Manager signature release level (i.e., a failure to meet a DQO), the Permittees shall receive written notification within five (5) calendar days of identification and shall also receive a nonconformance report within thirty (30) calendar days of identification of the incident. The Permittees shall require the generator/storage site to implement a corrective action which remedies the nonconformance prior to management, storage, or disposal of the waste at WIPP. The Permittees shall send NMED a monthly summary of nonconformances identified during the previous month, indicating the number of nonconformances received and the generator/storage sites responsible.	Editorial. This paragraph was moved from Section B3-1.

Section	Change	Explanation of Change
B3-12	~~The Permittees will receive written notification of all non-administrative nonconformances (i.e., a failure to meet a DQO) first identified during the Site Project Manager Review within five (5) days of identification. The Permittees will also receive a nonconformance report within thirty (30) days of identification. The generator/storage site will implement a corrective action process and resolve the identified nonconformance prior to the Permittees management, storage, or disposal of TRU mixed waste at WIPP.~~ ~~Permittees' Corrective Action Process~~	This paragraph has been combined with Nonconformance to Data Quality Objective (see previous change). Information related to the Permittee's corrective action process has been moved to Permit Attachment B7, Section B7-3. The justification to this change is provided in Section 1.2.2 of the revised PMR.
B3-12	The Permittees ~~shall initiate a~~ corrective action process when internal nonconformances and nonconformances at the generator/storage sites are identified is described in Permit Attachment B7. ~~Activities and processes that do not meet requirements are documented as deficiencies.~~ ~~When a deficiency is identified by the Permittees, the following process action steps are required:~~	Information related to the Permittee's corrective action process has been moved to Permit Attachment B7, Section B7-3. The justification to this change is provided in Section 1.2.2 of the revised PMR.

Section	Change	Explanation of Change
B3-12	~~• The condition is documented on a Corrective Action Report (**CAR**) by the individual identifying the problem.~~ ~~• The Permittees have designated the CAR Initiator and Assessment Team Leader to review the CAR, determine validity of the finding (determine that a requirement has been violated), classify the significance of the condition, assign a response due date, and issue the CAR to the responsible party.~~ ~~• The responsible organization reviews the CAR, evaluates the extent and cause of the deficiency and provides a response to the Permittees, indicating remedial actions and actions to preclude recurrence that will be taken.~~	Information related to the Permittee's corrective action process has been moved to Permit Attachment B7, Section B7-3. The justification to this change is provided in Section 1.2.2 of the revised PMR.
B3-12	~~• The Permittees review the response from the responsible organization and, if acceptable, communicate the acceptance to the responsible organization.~~ ~~• The responsible organization completes remedial actions and actions to preclude recurrence of the condition.~~ ~~• After all corrective actions have been completed, the Permittees schedule and perform a verification to assure that corrective actions have been completed and are effective. When all actions have been completed and verified as being effective, the CAR is closed by the CAR Initiator and Assessment Team Leader on behalf of the Permittees.~~ ~~• As part of the planning process for subsequent audits and surveillance, past deficiencies are reviewed and the previous deficient activity or process is subject to reassessment.~~	Information related to the Permittee's corrective action process has been moved to Permit Attachment B7, Section B7-3. The justification to this change is provided in Section 1.2.2 of the revised PMR.

Section	Change	Explanation of Change
B3-14	The Site Project Manager ~~and the Site Project QA Officer~~ shall review all non-administrative changes and evaluate whether those changes could impact DQOs specified in the Permit. After ~~site certification~~ WSPF approval, any changes to WAP-related plans or procedures that could positively or negatively impact DQOs (i.e., those changes that require prior approval of the Permittees as defined in Attachment B5, Section B5-2) shall be reported to the Permittees within five (5) days of identification by the project level review.	The project level of review is reduced to the Site Project Manager Review, thus eliminating the Site Project Quality Assurance Officer Review. The justification to this change is provided in Section 1.2.4 of the revised PMR. Editorial to clarify that, under the proposed waste stream approval process, the term "site certification" has been replaced with "WSPF approval."
B3-15	~~DOE. 1995a. Performance Demonstration Program Plan for the Analysis of Simulated Headspace Gases for the TRU Waste Characterization Program. CAN-95-1076, Current Revision, Carlsbad, New Mexico, Carlsbad Area Office, U.S. Department of Energy.~~ ~~DOE. 1995b. Performance Demonstration Program Plan for the Analysis of Solid Wastes for the TRU Waste Characterization Program. CAN-95-1077, Current Revision, Carlsbad, New Mexico, Carlsbad Area Office, U.S. Department of Energy.~~ ~~EG&G. 1993a. Preliminary Assessment of Real-Time Radiography and Visual Characterization for Selected Waste Containers. RAP-4604, Golden, Colorado, D. L. Ziegler and R. V. Harder, EG&G Rocky Flats, Rocky Flats Plant.~~	Editorial.
Table B3-2	~~Formaldehyde~~ ~~Hydrazine~~[#]	Formaldehyde and Hydrazine were deleted from Table B3-2 since these analytes were required only for homogenous solids and soil/gravel waste. Headspace gas analysis will not be performed on homogenous solids and soil/gravel waste. The justification for this change is provided in Section 1.2.1 and Appendix I of the Section 311 NOD Comment/Response Matrix.

Section	Change	Explanation of Change
Table B3-2 Footnotes c and d	~~[c] Required only for homogeneous solids and soil/gravel waste from Savannah River Site.~~ ~~[d] Required only for homogeneous solids and soil/gravel waste from Oak Ridge National Laboratory and Savannah River Site.~~	Deleted footnotes since headspace gas analysis will not be performed on homogenous solids and soil/gravel waste. The justification for this change is provided in Section 1.2.1 and Appendix I of the Section 311 NOD Comment/Response Matrix.
Table B3-3 footnote a	[a] Corrective action per ~~Section B3-13~~ Permit Attachment B7 when final reported QC samples do not meet the acceptance criteria.	Information related to the Permittee's corrective action process has been moved to Permit Attachment B7, Section B7-3. The justification to this change is provided in Section 1.2.2 of the revised PMR.
Table B3-4 footnotes	[f] Required only for homogeneous solids and soil/gravel waste from Savannah River Site, if analysis is required to resolve assignment of EPA hazardous waste numbers. [g] Required only for homogeneous solids and soil/gravel waste from Oak Ridge National Laboratory and Savannah River Site, if analysis is required to resolve assignment of EPA hazardous waste numbers.	Editorial to clarify that the generator/storage sites must use SSA to resolve assignment of EPA HWNs.
Table B3-5 footnote	[a] Corrective Action per ~~section B3-13~~ Permit Attachment B7 when final reported QC samples do not meet the acceptance criteria.	Information related to the Permittee's corrective action process has been moved to Permit Attachment B7, Section B7-3. The justification to this change is provided in Section 1.2.2 of the revised PMR.
Table B3-7 footnote	[a] Corrective action per ~~section B3-13~~ Permit Attachment B7 when final reported QC samples do not meet the acceptance criteria.	Information related to the Permittee's corrective action process has been moved to Permit Attachment B7, Section B7-3. The justification to this change is provided in Section 1.2.2 of the revised PMR.
Table B3-9 footnote	[a] Corrective action per ~~section B3-13~~ Permit Attachment B7 when final reported QC samples do not meet the acceptance criteria.	Information related to the Permittee's corrective action process has been moved to Permit Attachment B7, Section B7-3. The justification to this change is provided in Section 1.2.2 of the revised PMR.

Section	Change	Explanation of Change
Table B3-10	~~Radiography Operator~~ ~~Site-specific training based on waste matrix codes and waste material parameters; requalification every 2 years~~	Deleted text related to radiography operators. The generator/storage sites are no longer required to examine all containers through radiography or VE to identify physical form and verify the absence of prohibited items, unless AK does not clearly substantiate the physical form of the waste and the absence of prohibited items. The justification for this change is provided in Sections 1.2.1 and 1.2.2 of the revised PMR and Appendix I of the Section 311 NOD Comment/Response Matrix.
Table B3-11	Deleted entire Table B3-11	Table B3-11 was deleted because Batch Data Reports will be generated from sample collection and analytical data and will not include testing data. The term "testing" is relevant to radiography and VE which were removed from the generator/storage site's waste analysis requirements. The justification for this change is provided in Sections 1.2.1 and 1.2.2 of the revised PMR and Appendix I of the Section 311 NOD Comment/Response Matrix.
Table B3-11 footnote	B3-~~12~~11 ~~* The headspace gas analytical batch data report is not required for the LANL sealed sources waste containers that meet specified conditions and are assigned VOC concentration values in accordance with Section B-3a(1)(iii).~~	Removed language specific to LANL sealed sources and waste streams that meet conditions for reduced headspace gas sampling. In the revised PMR, HSGSA is required to resolve assignment of EPA hazardous waste numbers for all debris waste streams when AK is determined insufficient. The justification of this change is provided in Section 1.2.1 of the revised PMR and Appendix I of the Section 311 NOD Comment/Response Matrix.
Table B3-12 Contents and Footnote	B3-~~13~~12 . . . Table B3-~~14~~13 lists applicable flags. . . ~~*The headspace gas analytical batch data report is not required for the LANL sealed sources waste container that meet specified conditions and are assigned VOC concentration values in accordance with Section B-3a(1)(iii).~~ . . .	Removed language specific to LANL sealed sources and waste streams that meet conditions for reduced headspace gas sampling. In the revised PMR, HSGSA is required to resolve assignment of EPA hazardous waste numbers for all debris waste streams when AK is determined insufficient.

Section	Change	Explanation of Change
Table B3-13	B3-~~14~~13	Table has been renumbered